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GALAXY GAMING, INC.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AGS, LLC, a Delaware limited liability
company; RED CARD GAMING, INC., a
Nevada corporation,

Plaintiffs and Counter-Defendants,
v.

GALAXY GAMING, INC., a Nevada
corporation,

Defendant and Counterclaimant.

Case No. 2:14-cv-02018-JAD-CWH

STIPULATION TO SEAL DKT. # 55-4

Plaintiffs and Counter-Defendants AGS, LLC (“AGS”) and Red Card Gaming, Inc.
 (“Red Card”) (collectively, “Plaintiffs”), by and through their counsel, Holland & Hart LLP, and
 Defendant and Counterclaimant Galaxy Gaming, Inc. (“Galaxy” or “Defendant”), by and

1 through its counsel Watson Rounds, hereby stipulate and agree that the AGS-Red Card Letter of
2 Intent (Dkt. # 55-4) should be treated as confidential business information and should be sealed.¹

3 Pursuant to the Ninth Circuit's ruling in *Kamakana v. City & County of Honolulu*, 447
4 F.3d 1172, 1180 (9th Cir. 2006), "compelling reasons" exist to justify sealing the document.
5 Prior to Plaintiffs' production of the document, the parties agreed to maintain the document in
6 confidence, at least preliminarily, but Galaxy inadvertently filed it without placing it under seal.
7 "Fed. R. Civ. P. 26(c)(1)(G) anticipates that the court may require that 'a trade secret or other
8 confidential research, development, or commercial information not be revealed....'" *Selling*
9 *Source, LLC v. Red River Ventures, LLC*, No. 2:09-cv-01491-JCM-GFW, 2011 WL 1630338, at
10 *1 (D. Nev. Apr. 29, 2011).

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27 ¹ This action is in its early stages and a protective order has not yet been entered. Defendant reserves the right to
28 contest any or all of the following: (i) whether the information that is the subject of this Stipulation constitutes
confidential business information, (ii) whether the information that is the subject of this Stipulation is in need of any
protection, or (iii) whether Plaintiffs would incur any harm by the disclosure of this information.

1 For all of the reasons above and to maintain the confidentiality of this narrowly tailored
2 information, the parties request that Dkt. # 55-4 be sealed by the Court.

3 DATED: March 10, 2015

4 **HOLLAND & HART LLP**

WATSON ROUNDS

5
6 /s/ Ryan Loosvelt

/s/ Ryan J. Cudnik

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14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated: March 11, 2015.

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U.S. DISTRICT COURT JUDGE